

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAWN JONES, on behalf of herself, individually, and
on behalf of all others similarly-situated,

Plaintiff,

-against-

STRATEGIC FINANCIAL SOLUTIONS L.L.C.,
and PIONEER LAW FIRM, P.C., d/b/a THE LAW
OFFICES OF JOHN DOUGHERTY AND
ASSOCIATES, and TIMBERLINE CAPITAL
VENTURES, INC., and HARBOR LEGAL GROUP,
L.L.C., d/b/a THE LAW OFFICES OF G.
ANTHONY YUTHAS, and CREDIT ADVOCATES
LAW FIRM, LLC,

Defendants.

16-cv-04617 (SN)

**NOTICE OF JOINT MOTION FOR FINAL APPROVAL OF CLASS AND
COLLECTIVE ACTION SETTLEMENT, SERVICE AWARDS, AN AWARD OF
ATTORNEYS' FEES AND EXPENSES, AND THE ENTRY OF FINAL JUDGMENT**

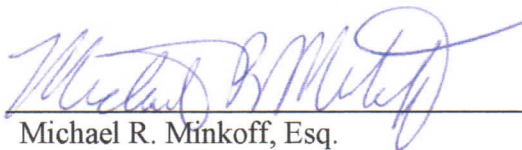
For the reasons set forth in the enclosed Memorandum of Law in Support of their Joint Motion for Final Approval of Collective and Class Action Settlement, Service Awards, an Award of Attorneys' Fees and Expenses, and the Entry of Final Judgment, and the Declaration of Michael R. Minkoff, Esq., ("Minkoff Decl."), and the exhibits attached thereto, and the Declaration of Michael Olney, Claims Administrator, all Parties to this litigation jointly and respectfully request that the Court enter an Order:

- 1) Granting final approval of the Parties' Settlement Agreement and Release ("Settlement Agreement"), annexed as **Exhibit C** to the Minkoff Decl., as well as the Parties' Settlement Agreement Addendum, annexed as **Exhibit E** to the Minkoff Decl.;
- 2) Authorizing the distribution of settlement checks to all Class Members that did not opt-out of this action, representing their share of the Settlement Fund;

- 3) Awarding Service Awards, totaling \$40,000.00, to the Named Plaintiff Dawn Jones and Opt-in Plaintiff Rodney Watkins, in the amount of \$20,000.00 each;
- 4) Awarding attorneys' fees in the amount of \$300,000.00, for legal services performed in prosecuting and settling the claims in this action, to Class Counsel;
- 5) Awarding \$8,616.54 for costs and out-of-pocket expenses to Class Counsel;
- 6) Awarding \$20,000.00 for Claims Administration fees and costs to Arden Claims Service, LLC ("Arden");
- 7) Providing for the release of all claims as specified in the Settlement Agreement by all Class Members who did not properly and timely opt-out of the settlement; and
- 8) Dismissing this action against Defendants with 'prejudice, but with the Court's continued jurisdiction over the construction, interpretation, implementation, and enforcement of the Parties' settlement and over the administration and distribution of the settlement fund.

Dated: New York, New York
May 30, 2018

Respectfully submitted,



Michael R. Minkoff, Esq.
Alexander T. Coleman, Esq.
Michael J. Borrelli, Esq.

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